

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

HANS A. QUAAK, ATTILIO PO
and KARL LEIBINGER, on behalf of themselves
and those similarly situated,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 03-CV-11566 (PBS)

STONINGTON PARTNERS, INC., a Delaware
Corporation, STONINGTON CAPITAL
APPRECIATION 1994 FUND L.P., a Delaware
Partnership and STONINGTON HOLDINGS, L.L.C., a
Delaware limited liability company,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 04-CV-10411 (PBS)

GARY B. FILLER and LAWRENCE PERLMAN,
Trustees of the TRA Rights Trust,
Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 04-CV-10477 (PBS)

JANET BAKER and JAMES BAKER, JKBAKER LLC
and JMBAKER LLC,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 04-CV-10501 (PBS)

**PLAINTIFFS' UNOPPOSED MOTION
FOR LEAVE TO FILE PAPERS UNDER SEAL**

Plaintiffs hereby move, pursuant to L.R. 7.2, for an order authorizing the filing under seal of: (a) Memorandum In Support of Plaintiffs' Motion For Reconsideration Of The Portion Of The July 10, 2006 Order Denying Plaintiffs' Motion To Compel Dexia Bank Belgium To Produce Piet Cordonnier For Deposition ("Memorandum") (**Exhibit A**); and (b) the Declaration of Allison K. Jones in support of the same ("Jones Declaration") (**Exhibit B**).

In support of this unopposed motion, Plaintiffs state as follows:

1. On May 31, 2005, the Court entered an Order Governing the Treatment of Confidential Information in each of the above-captioned actions (the "Confidentiality Order"). A true and correct copy of the Confidentiality Order is annexed as **Exhibit C** to this Motion. Under the terms of the Confidentiality Order, discovery materials that the producing party has designated as "Confidential Information" must be filed with the Court under seal. *See* Confidentiality Order at ¶10.

2. On July 24, 2006, Plaintiffs filed a Motion For Reconsideration Of The Portion Of The July 10, 2006 Order Denying Plaintiffs' Motion To Compel Dexia Bank Belgium To Produce Piet Cordonnier For Deposition. In support of that Motion, Plaintiffs also filed the Memorandum and Jones Declaration, which discuss and attach various documents that Dexia has produced in this litigation. These documents have not been filed with the Court because Dexia has designated them "Confidential" under the May 31, 2005 Protective Order.

WHEREFORE, Plaintiffs respectfully request that this Court enter an order authorizing the filing under seal of the attached Memorandum and Jones Declaration.

Certification Pursuant To Local Rule 7.1(a)(2)

Pursuant to Local Rules 7.1(a)(2), undersigned counsel hereby certify that counsel for Dexia does not oppose the instant motion.

Dated: July 24, 2006

Respectfully submitted,

**BERMAN DEVALERIO PEASE
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